

**UNITED STATES BANKRUPTCY COURT  
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

IN RE:

MICHAEL D. NOLAN

LINDA R. NOLAN

Debtor/Respondent

v

IRS DEPARTMENT OF TREASURY

Creditor

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BK. NO. 1-20-00962

CHAPTER 13 PROCEEDING

**AMENDED  
OBJECTION TO PROOF OF CLAIM  
FILED BY IRS DEPARTMENT OF TREASURY**

AND NOW come the Debtor, Michael and Linda Nolan, by and through through attorney, James H. Turner, to object to the above-mentioned Creditor's Proof of Claim #2-1. The debtor has filed their state 2019 tax returns and they were submitted to the IRS. The amount that has been estimated in his claim should be disallowed.

/s/ James H. Turner, Esquire  
James H. Turner, Esquire  
Turner and O'Connell  
915 N Mountain Road, Suite D  
Harrisburg, PA 17112  
717/232-4551

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**CERTIFICATE OF SERVICE**

On this 2<sup>nd</sup> day of December, 2020, I, James H. Turner, Esquire, do hereby certify that I placed in the U.S. mail, first class, postage prepaid a true and correct copy of the foregoing Notice addressed to the persons listed below.

IRS  
Department of Treasury  
Bankruptcy Division  
600 Arch Street, Rm 5200  
Philadelphia, PA 19106

/s/ James H. Turner, Esquire  
James H. Turner  
915 N Mountain Road, Suite D  
Harrisburg, PA 17112  
(717) 232-4551

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**ORDER**

In consideration of the objection to proof of claim filed by Debtor, it is hereby  
Ordered that the proof of claim of IRS – Department of Treasury, #2-1 should not be  
allowed as stated.

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TO: IRS DEPARTMENT OF TREASURY

**NOTICE TO CLAIMANT OF OBJECTION TO CLAIM  
AND HEARING DATE**

Michael and Linda Nolan, filed an objection to the proof of claim you filed in this bankruptcy case.

**Your claim may be reduced, modified, or eliminated.** You should read this notice and the objection carefully and discuss them with your attorney, if you have one.

**Response deadline is January 1, 2021**

United States Bankruptcy Court  
Middle District of Pennsylvania  
Ronald Reagan Federal Building,  
Third & Walnut Streets  
Harrisburg, PA 17101

**If you or your attorney do not respond to the objection, the Court may decide that you do not oppose the objection to your claim.**

James H. Turner, Esquire  
915 N Mountain Road  
Suite D  
Harrisburg, PA 17112  
(717)232-4551 Phone  
(717)232-2115 Fax  
[pat@turnerandoconnell.com](mailto:pat@turnerandoconnell.com)  
29928

December 2, 2020